

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
No. 5:19-cv-00394-BO

STEWART ABRAMSON, PAUL JONES)
AND MARK FITZHENRY,)
ON BEHALF OF THEMSELVES AND)
ALL OTHERS SIMILARLY SITUATED,)
)
 PLAINTIFFS,)
)
 v.)
)
SAFE STREETS USA LLC, and TEKTIKS)
INNOVATIVE NETWORK USA INC,)
)
)
)
 DEFENDANTS.)

**PLAINTIFFS' MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs Paul Jones, Mark Fitzhenry, and Stewart Abramson, individually and on behalf of a proposed class of similarly situated persons, with the consent of Defendant Safe Streets USA LLC, hereby move the Court for entry of an order preliminarily approving the class action settlement set forth in the Parties' Settlement Agreement ("Settlement" or "Agreement"), certifying a class for settlement purposes, and providing for issuance of Notice to the Settlement Class. The grounds for this Motion are set forth with particularity and in more detail in the accompanying Memorandum in Support, which is incorporated herein by reference.

Dated: August 2, 2021

Respectfully submitted,

/s/ Avi R. Kaufman

Avi R. Kaufman, Florida State Bar # 84382

Kaufman P.A.

400 NW 26th Street

Miami, FL 33127

Telephone: (305) 469-5881

Email: kaufman@kaufmanpa.com

Anthony I. Paronich
Paronich Law, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
[o] (617) 485-0018
[f] (508) 318-8100
anthony@paronichlaw.com

Counsel for Plaintiffs

/s/ Ted Johnson

Ted Lewis Johnson
North Carolina State Bar # 39791 PO
Box 5272
Greensboro, NC 27435
Telephone: (336) 252-8596
Email: tedlewisjohnson@tedlewisjohnson.com

Local Civil Rule 83.1(d) Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 2, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which is being served this day on all counsel of record via transmission of Notice of Electronic Filing generated by CM/ECF.

/s/ Avi R. Kaufman